

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

NOV 29 2007

J. Michael Kelley, Ph.D.  
Vice President, toXcel, LLC  
P.O. Box 363  
7140 Heritage Village Plaza  
Gainesville, VA 20156

Dear Dr. Kelley:

Subject: Labeling Amendment  
Avon Skin-So-Soft SSS Bug Guard Plus IR3535  
EPA Reg. No. 806-32  
Your submission dated July 16, 2007

The labeling amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has been received and reviewed, and your request to add deer ticks to the labeling is acceptable. Please submit three (3) copies of your final printed labeling incorporating these changes prior to releasing your product for shipment. A stamped accepted copy of the labeling is enclosed for your records.

Should you have any questions concerning this action, you may contact Leonard Cole directly at 703.305.5412 or via email at [cole.leonard@epa.gov](mailto:cole.leonard@epa.gov). We hope you find this information helpful.

Sincerely,

Linda A. Hollis, Chief,  
Biochemical Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511P)

CONCURRENCES

SYMBOL	▶ 7511P	7511P					
SURNAME	▶ COLE	Bombard					
DATE	▶ 11/28/07	11/28/07					

IR 3535

FRONT OF CONTAINER:

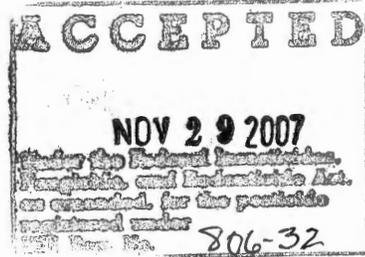
AVON  
SKIN-SO-SOFT  
S  
S  
S  
BUG GUARD *PLUS*  
IR3535®  
EXPEDITION™  
INSECT REPELLENT  
SPF 30 SUNSCREEN SPRAY  
VERY WATER RESISTANT  
UNSCENTED

**[ALTERNATE BRAND NAME #1:]**

AVON  
SKIN-SO-SOFT  
S  
S  
S  
IR3535®  
EXPEDITION™  
INSECT REPELLENT  
SPF 30 SUNSCREEN SPRAY  
VERY WATER RESISTANT  
UNSCENTED

**[ALTERNATE BRAND NAME #2:]**

AVON  
BUG GUARD *PLUS*  
IR3535®  
EXPEDITION™  
INSECT REPELLENT  
SPF 30 SUNSCREEN SPRAY  
VERY WATER RESISTANT  
UNSCENTED



KEEP OUT OF REACH OF CHILDREN  
WARNING  
See back panel for First Aid

ACTIVE INGREDIENT:  
3-[N-butyl-N-acetyl]-aminopropionic acid, ethyl ester\* 19.7%  
OTHER INGREDIENTS: 80.3%  
TOTAL: 100.0%  
\*IR3535®

- 1.0 OZ. (28.35 g)
- 2.0 OZ. (56.7 g)
- 4.0 OZ. (113.4 g)
- 6.0 OZ. (170.1 g)
- 8.0 OZ. (226.8 g)

[Text within brackets is optional and may appear on the back of container label]

BACK OF CONTAINER:

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. An adult must apply this product to children under age 10. Do not apply over wounds, freshly shaved or irritated skin. **Shake well.** **TO APPLY TO FACE:** Spray palm of hand and rub on, avoiding the eye area. **TO APPLY TO SKIN:** Spray liberally with a sweeping motion; rub product on evenly before sun and insect exposure. **FOR CONTINUED PROTECTION** from deer ticks reapply after 12 hours, and for mosquitoes reapply after 8 hours, and for gnats, no-seeums, sand flies and biting midges reapply after 6 hours. For sunscreen protection, reapply after towel drying, swimming or sweating. **REAPPLY AS NEEDED, NOT TO EXCEED 3 APPLICATIONS PER DAY.**

**STORAGE AND DISPOSAL**

**STORAGE:** Store in cool, dry place away from heat or flame. **DISPOSAL:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

**PRECAUTIONARY STATEMENTS: Hazards to Humans. WARNING.** Causes substantial but temporary eye injury. Do not spray on face, clothing or in eyes. Do not rub eyes with fabric that has contacted product or treated skin. Discontinue use and consult a doctor if irritation or rash occurs. Ask a doctor before using on children under 6 months of age. For external use only.

**PHYSICAL OR CHEMICAL HAZARDS - FLAMMABLE:** Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

[Intentional misuse by deliberately concentrating and inhaling contents may be harmful or fatal.]

[Avoid contact with plastics, costume jewelry, leather and synthetic fibers. May damage painted or varnished surfaces, including nail polish.]

**FIRST AID**

If in eyes:	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

**ACTIVE SUNSCREEN INGREDIENTS:**

- Octocrylene 9.0%
- Octinoxate 6.8%
- Oxybenzone 5.4%
- Octisalate 4.5%

**[OTHER INGREDIENTS: SD Alcohol 40-B, Water, Isobutane, Hexylene glycol, Polyurethane-1, Propane, Tocopheryl acetate (Vitamin E)]**

[Text within brackets is optional and may appear on the back of container label]

BACK OF CONTAINER- continued:

To order, see an Avon Representative, or call 1-800-FOR-AVON. www.avon.com

Not for sale or use after expiration date.

EPA Reg. No. 806-32

EPA Est. No. [013891-IN-001[PI], 013891-IN-001, 054487-GA-001[XP], 054487-GA-001]

[Boxed letters are first letters of lot number]

AVON PRODUCTS, INC., DISTR. 1251 AVE. OF THE AMERICAS, NY, NY 10020

© AVON 200X – ALL RIGHTS RESERVED

Bottom of Container:

[Boxed letters are first letters of lot number] Julian Day Lot Code Number

EXP Month / Year

**Note to reviewer: The following statements, including those within brackets, are optional AND may appear on the product label AND / OR in marketing collateral materials AND the use of punctuation marks for each statement is optional**

Dual protection from sun and certain insects

Combined sun and insect protection in one product

Light feel, strong protection

SHAKE WELL

SPF 30 Very Water Resistant

Helps prevent sunburn

Higher SPF gives more sunburn protection

Retains SPF after 80 minutes of activity in the water or sweating

PABA-free

U.S. Patent Nos. 6,719,959, 6,969,521 and 7,150,878

and other patents pending

Contains Vitamin E

[With] Vitamin E

[Contains] IR3535®

IR3535® is a registered trademark of Merck KGaA

IR3535® is chemically similar to  $\beta$ -alanine [, which occurs naturally]

Unscented

Easy to apply

Sprays at any angle

Light feeling spray

Non-oily

Not oily

Non-greasy

Not greasy

Light feel

Quick drying

Fast drying

For active [family] lifestyles

Suitable for the [entire] [whole] family

[Gentle] [Mild] formula

Gentle and mild formula

Formula does not need to be washed off when returning from the outdoors

Dermatologist tested

Hypoallergenic

Provides the whole family with an effective [broad-spectrum] outdoor insect repellent

Protection for the [entire] [whole] family

Strong protection for the [entire] [whole] family

[Strong] [Dependable] Protection

Effective, dependable protection

Provides strong and dependable [protection] [repellency]

When used as directed, works anytime to prevent mosquitoes from biting

[Repellency –] Avon's exclusive formula [with IR3535®] provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-see-ums, sand flies and biting midges

[Repellency -] Patented technology that provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

[Repellency -] Provides effective and long-lasting [repellency] [protection] from deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Exclusive patented enhanced duration technology

Patented time-release technology

Time-release formula

Patented controlled-release technology

Controlled-release formula

Strong and long-lasting [repellency] [protection] against mosquitoes [up to] [for] 8 hours

Strong and long-lasting [repellency] [protection] against deer ticks [up to] [for] 12 hours

Strong [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Long-lasting [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Provides hours of [repellency] [protection] from deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Strong [repellency] [protection] against mosquitoes

Long-lasting [repellency] [protection] against mosquitoes

Prevents mosquitoes from biting [up to 8 hours] [for 8 hours]

Repels mosquitoes [up to] [for] [8 hours]

Strong [repellency] [protection] against deer ticks

Long-lasting [repellency] [protection] against deer ticks

Repels deer ticks [up to] [for] [12 hours]

Repels gnats, no-seeums, sand flies and biting midges [up to] [for] [6 hours]

[Creates an] [invisible] [unseen] [hidden] [layer] [barrier] of protection to repel [certain insects] [mosquitoes]

Repels mosquitoes that may [carry] [transmit] West Nile Virus [up to] [for] 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus

Repels deer ticks that may [carry] [transmit] Lyme Disease [up to] [for] 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease

No CFCs

Contains no CFCs [or other ozone depleting substances]

Federal Regulations prohibit CFC propellants in aerosols

Made in the USA